



## Kansas Immunization Program Monitoring and Reporting Borrowing of VFC Vaccine Guidance

The Vaccines for Children (VFC) Program requires the Kansas Immunization Program (KIP) ensure that VFC provider vaccine management practices are consistent with sound immunization, fiscal, business and medical practices, and do not result in unnecessary costs to the program due to excessive wastage or unaccounted for VFC vaccines. The Centers for Disease Control and Prevention (CDC) have established minimum guidelines detailing the steps of proper vaccine storage and handling. This toolkit is found at:

<http://www.cdc.gov/vaccines/recs/storage/toolkit/storage-handling-toolkit.pdf>

Kansas VFC providers are diligent in their practices to ensure sound vaccine management practices. The Kansas Immunization Program appreciates these efforts. These vaccine management policies are designed to help assure continuation of the VFC program for Kansas children by:

- a. Assisting each provider clinic in quality improvements in VFC vaccine management practices
- b. Reducing wasted vaccines
- c. Ensuring vaccines are stored appropriately so they are stable
- d. Decreasing and/or eliminating unaccounted for vaccines

Clinic policies and procedures shall be updated annually with signature and date. Program staff will review each clinic's policies and procedures at the VFC compliance site visit and/or unannounced visits. VFC providers must have policies and procedures to address management of VFC vaccines in each of the following areas; Vaccine Storage and Handling, Vaccine Ordering, Vaccine Borrowing, Wasted Vaccine and Emergency Management.

### Borrowing Policy

**"Effective January 1, 2014: Program Supplied Vaccine may be borrowed on a Rare Emergency Basis Only. All borrowed vaccines must be documented on the borrowing form and submitted to KIP once repayment is made."**

The federal VFC program requires the Kansas Immunization Program (KIP) to monitor and report the number of doses and frequency of VFC and all state funded vaccine doses borrowed.

Beginning October 1, 2013, the CDC stipulated that VFC-funded vaccine may not be borrowed for any reason without the express written permission from the CDC. Borrowing VFC-funded vaccines should never occur. However, KIP presented an alternative plan to the CDC which was approved: Borrowing may occur on a rare, emergency basis only to prevent a child from not being immunized.

Borrowing from VFC or CHIP vaccine due to inadequate private vaccine being stocked is strictly prohibited. Borrowing from private stock that is not monitored twice daily by a certified calibrated thermometer is also prohibited.

Excessive borrowing, failure to repay borrowed vaccine, and refusal to carry vaccine per needs of clientele is subject to OIG reporting of Fraud and Abuse.

Federal fraud and abuse laws apply to the entire VFC program. In addition, for those portions of the VFC program involving state funds, state fraud and abuse/consumer protection/medical licensure laws may also apply.

- **Fraud:** An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable federal or state law.
- **Abuse:** Provider practices that are inconsistent with sound fiscal, business, or medical practices and result in an unnecessary cost to the Medicaid program (and/or including actions that result in an unnecessary cost to the immunization program, a health insurance company, or a patient); or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for healthcare. Abuse also includes recipient practices that result in unnecessary cost to the Medicaid program.

(For additional information on Fraud and Abuse, please refer to the Fraud and Abuse Policy.)

Please send a copy of all borrowing forms to KIP once repayment is made. This will help KIP and your clinic document the use of vaccine in all funding categories. Please submit the borrowing forms to: [www.vaccines@kdheks.gov](mailto:www.vaccines@kdheks.gov) or fax to: 785-296-6510.

KIP staff is available to assist the practice in review of vaccine ordering to help eliminate or decrease borrowed vaccines. Contact your nurse consultant or the Topeka office at: 785-296-5591.